

US Environmental Protection Agency,
DocketID No.EPA-HQ-OW-2007-1126,
EPADocketCenter(EPA/DC),
Water Docket, MC 2822T,
1200 Pennsylvania Avenue, NW
Washington, DC20460

Re: Comments on Draft Revision of Gulf Hypoxia Action Plan 2008

The Louisiana Seafood Marketing and Promotion Board would like to submit the following comments on the Draft Revision of the Action Plan for Reducing Hypoxia in the Northern Gulf of Mexico. The mission of the Seafood Board is to promote all the commercial fisheries products caught in our waters. The shrimping sector is our largest fisheries representing just over a third of the nation's domestic shrimp supply which has a billion dollar economic impact to our state. Including the other species of fish, crawfish, oysters and finfish, the state realizes nearly a 3 billion dollar impact from our fisheries which employs approximately 16,000 fishermen hence the importance of this letter.

The Board has expressed its strong support for addressing the serious problem of Gulf hypoxia on a number of occasions since the adoption of the first Action Plan in 2000. We have supported the cooperative framework that was formed between states and the federal government to address this problem. However, at a time when the Gulf communities and producers who depend on a healthy ecosystem and fishery are under economic and environmental stress, we are concerned about the slow rate of progress in achieving reductions in nutrient loading upstream in the Mississippi River Basin.

The 2001 Action Plan pointed out that because of the large size of the Mississippi River Basin, results from actions taken will take some time to be measurable (p.19). The recently completed report by the EPA Science Advisory Board (SAB) on the Gulf Hypoxia issue concluded that the ecosystem offshore is becoming more sensitive to hypoxia, and that as a result shifts in species are becoming more likely.

In the current draft revision of the Plan, we support the Task Force's decision to keep the goal of reducing the 5-year running average size of the hypoxic zone to less than 5,000 square kilometers by the year 2015 through "implementation of specific, practical, and cost-effective voluntary actions...", and the inclusion of the point made by the SAB report that "it is even more important to proceed in a directionally correct fashion to manage factors affecting hypoxia than to wait for greater precision in setting the goal for the size of the zone" (p.5).

However, as the draft also points out, current resources are insufficient to attain the goals of the Plan (p.6). We are concerned that neither the new draft Plan nor the Hypoxia Task Force has announced a specific plan for obtaining an increase in funding that would make progress towards reaching the goal of significantly reducing the hypoxic zone. As noted above, the Gulf finfish and shrimp fisheries are of crucial importance nationally for maintaining a supply of safe, local, wild seafood for the country. Loss of this resource would be irreplaceable. We believe that the

country supports investing in protecting this productive wild coastal fishery, and urge the Task Force to appeal to Congress and the White House to do so.

Sincerely,

Ewell Smith
Executive Director
LouisianaSeafood Promotion and Marketing Board
UNO Advanced TechnologyCenter
2021 Lakeshore Dr., Suite 300
New Orleans, LA70122
504-283-8150

<http://www.LouisianaSeafood.com>
<http://www.LouisianaOysters.org>
<http://www.LouisianaShrimp.com>
<http://www.GreatAmericanSeafoodCookOff.com>